

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

DANIEL B. GRAVES,  Plaintiff,  v.  DEUTSCHE BANK SECURITIES, INC.,  Defendant.	<b>CIVIL ACTION NO.</b> <b>1:07-cv-05471-BSJ-KNF</b>  <b>ECF Case</b>
--	--

**DECLARATION OF RICHARD T. SEYMOUR IN  
SUPPORT OF PLAINTIFF'S MOTION FOR  
LEAVE TO FILE DOCUMENTS UNDER SEAL,  
AND TO CORRECT AN INADVERTENT ERROR**

Washington, D.C., ss:

I make the following declaration subject to the penalties for perjury:

1. I am lead counsel for plaintiff in this action.
2. This case involves the context of investment banking.
3. The numerous documents that are the subject of the Motion fall into several types, each worthy of protection.
4. Some documents concern the performance evaluations of present or former employees of defendant who are not parties to this action, and involve their right to privacy.
5. Some documents concern the compensation of present or former employees of defendant who are not parties to this action, and involve their right to financial privacy.
6. Some documents involve information about individuals and corporations actually or potentially doing business with defendant, with evaluations of their prospects, management teams, and finances. None of these individuals or corporations are parties before the Court.

7. Some documents may involve information given in confidence to defendant by such individuals and corporations.

8. Some documents involve defendant's internal business and personnel practices, and I believe defendant has a legitimate interest in keeping them confidential.

9. The public filing includes the complete deposition transcripts of the witnesses whose deposition transcripts were cited.

Respectfully submitted,

/s/ Richard T. Seymour  
Richard T. Seymour (RS-8094)  
[rick@rickseymourlaw.net](mailto:rick@rickseymourlaw.net)  
Law Office of Richard T. Seymour, P.L.L.C.  
Suite 900, Brawner Building  
888 17th Street, N.W.  
Washington, DC 20006-3307  
(202) 785-2145 – Telephone  
(202) 549-1454 – Cell  
(800) 805-1065 – Telecopier

Dated: July 12, 2012

**Certificate of Service**

I certify that I have, this 12th day of July, 2012, served a true and correct copy of the Declaration of Richard T. Seymour in Support of Plaintiff's Motion for Leave to File Documents Under Seal, on counsel of record for defendant, as shown below, by service through the Court's ECF system:

Cliff Fonstein, Esq.  
Nicholas H. De Baun, Esq.  
Tara Conroy, Esq.  
Seyfarth Shaw LLP  
620 Eighth Avenue  
New York, NY 10018

/s/ Richard T. Seymour  
Richard T. Seymour (RS-8094)  
[rick@rickseymourlaw.net](mailto:rick@rickseymourlaw.net)  
Law Office of Richard T. Seymour, P.L.L.C.  
Suite 900, Brawner Building  
888 17th Street, N.W.  
Washington, DC 20006-3307  
(202) 785-2145 – Telephone  
(202) 549-1454 – Cell  
(800) 805-1065 – Telecopier